

EXHIBIT T

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS – RICHMOND
REGION COUNCIL 4614, et al.

Plaintiffs,

v.

PUBLIC INTEREST LEGAL
FOUNDATION, an Indiana Corporation,
and J. CHRISTIAN ADAMS

Defendants.

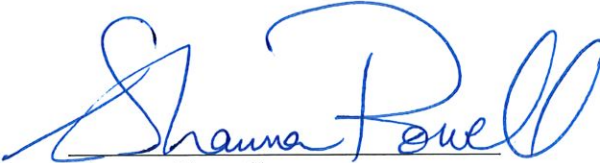
Civil Action No. 1:18-cv-00423-LO-IDD

DECLARATION OF DEFENDANT PUBLIC INTEREST LEGAL FOUNDATION

The Public Interest Legal Foundation states as follows:

1. The Foundation does not track the amount of money donated to it in response or in relation to the Alien Invasion Reports.
2. The Foundation does not track the amount of money donated to it in response or in relation to this Litigation.
3. The Foundation contracts with a direct mail provider, ForthRight Strategy. ForthRight Strategy provides the Foundation with monthly accounting statements that do not show any accounting of income or expense assigned to any specific letter but rather total accounting by month.
4. The Foundation does not keep records regarding funds raised as a result of any specific email solicitation.
5. The Foundation handles all email solicitations in house using an email platform. The email platform does not have an accounting of funds donated in relation or response to any email.
6. The Foundation has no other third party involved in its fundraising activities other than those on whom Plaintiffs have already served third party discovery.

5/15/19
Date


Shawna Powell,
Public Interest Legal Foundation